

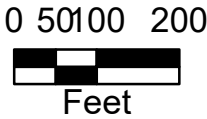
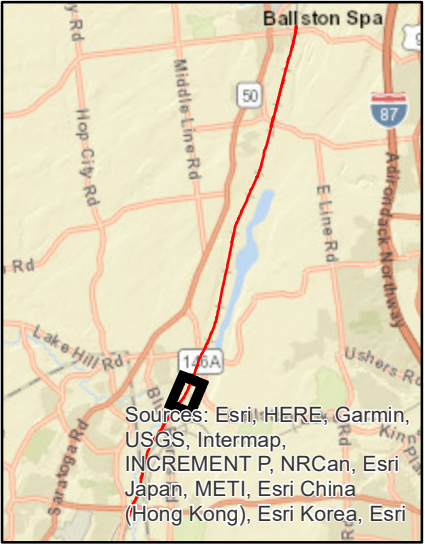
CHPE EM&CP

Saratoga and  
Schenectady County,  
New York

Deviation Zone Analysis



- Stations
- Excursions
- - - HDD Excursions
- Delineated Streams
- Wetland Buffer
- Delineated Wetlands
- Deviation Zone

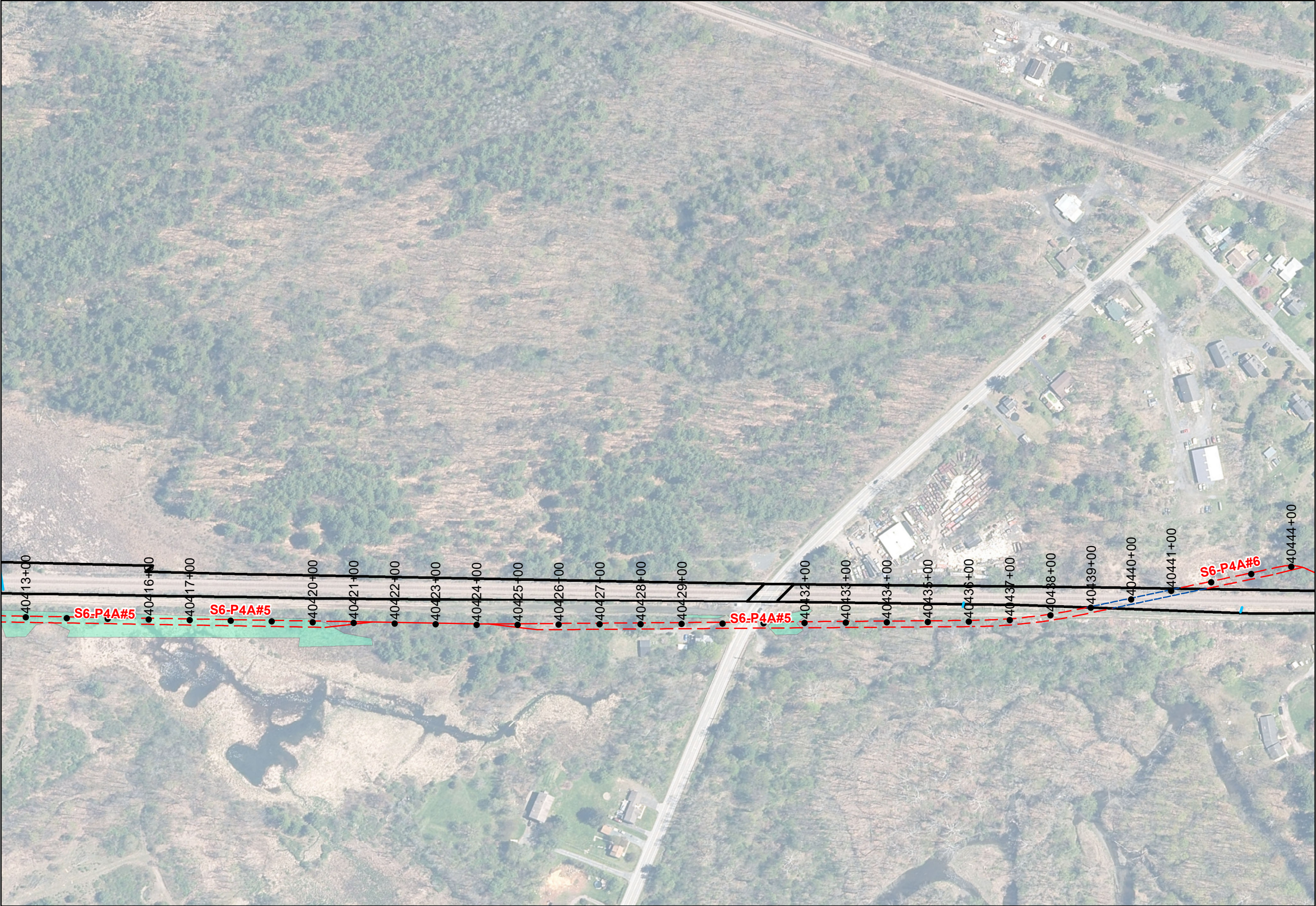




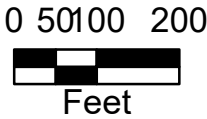
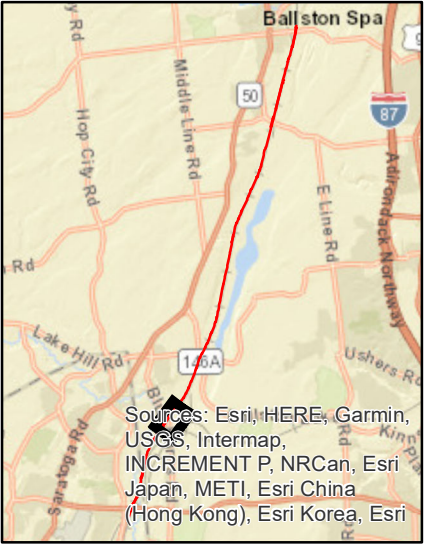
CHPE EM&CP

Saratoga and  
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Deviation Zone Analysis



- Stations
- HDD
- Excursions
- - - HDD Excursions
- Delineated Streams
- Delineated Wetlands
- Deviation Zone





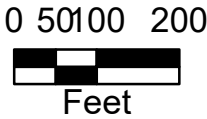
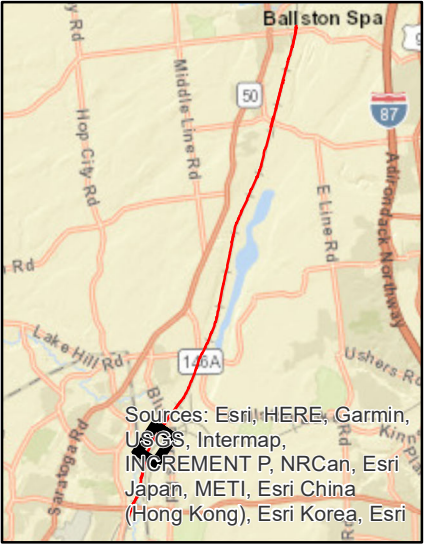
CHPE EM&CP

Saratoga and  
Schenectady County,  
New York

Deviation Zone Analysis



- Stations
- Trench
- Excursions
- - - HDD Excursions
- Delineated Wetlands
- Deviation Zone





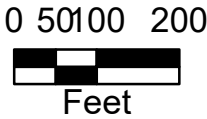
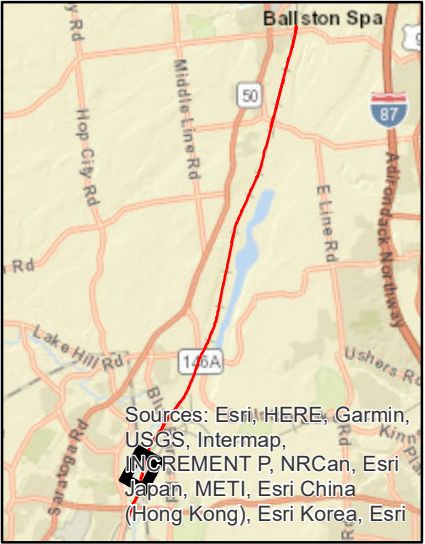
CHPE EM&CP

Saratoga and  
Schenectady County,  
New York

Deviation Zone Analysis



- Stations
- Trench
- - - HDD
- Excursions
- - - HDD Excursions
- Delineated Wetlands
- Deviation Zone

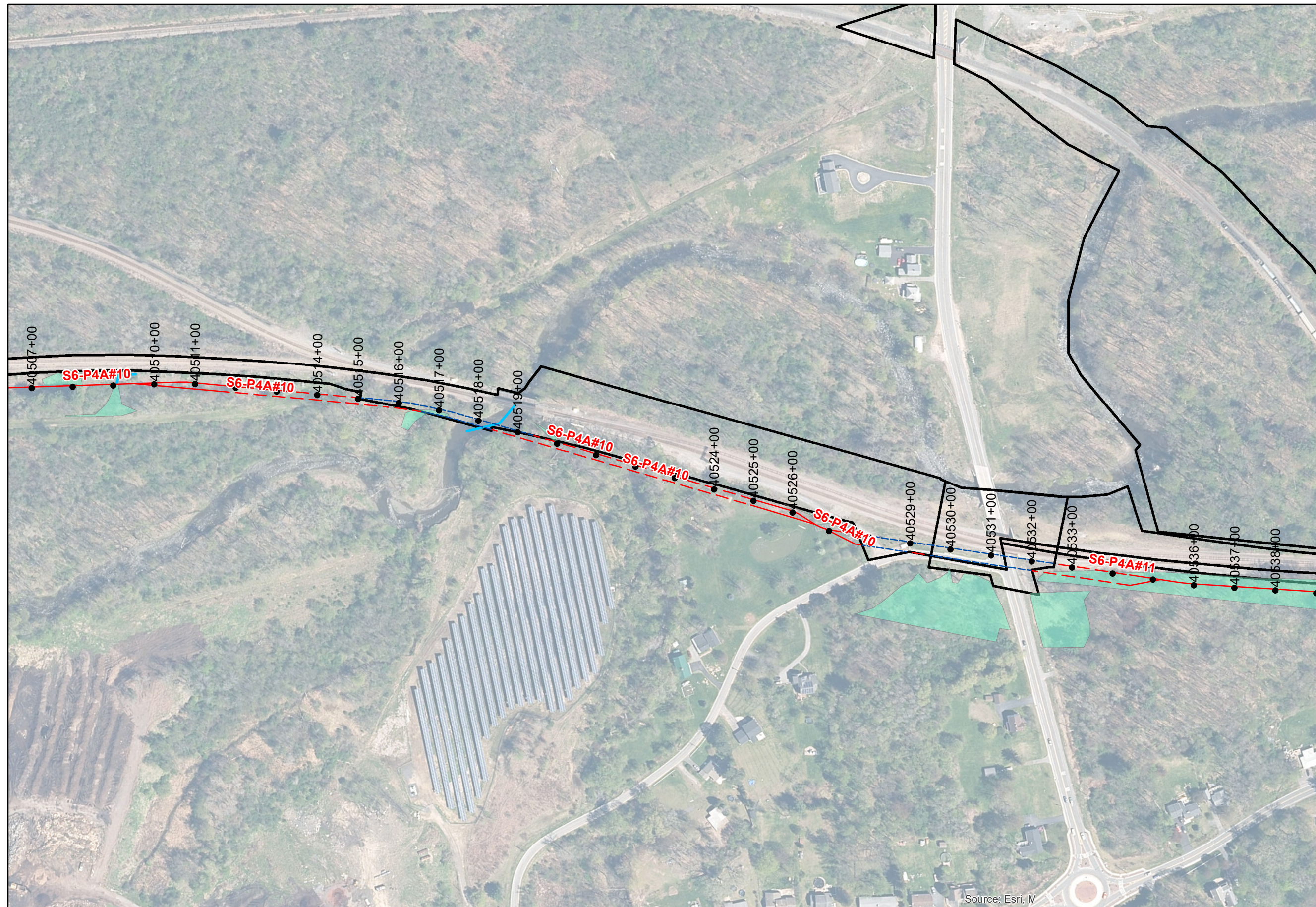




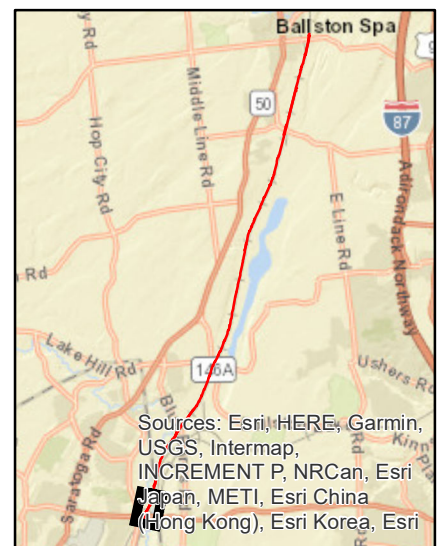
## CHPE EM&amp;CP

***Saratoga and  
Schenectady County,  
New York***

### Deviation Zone Analysis



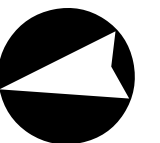
- Stations
- HDD
- Excursions
- - - HDD Excursions
- Delineated Streams
- Delineated Wetlands
- Deviation Zone



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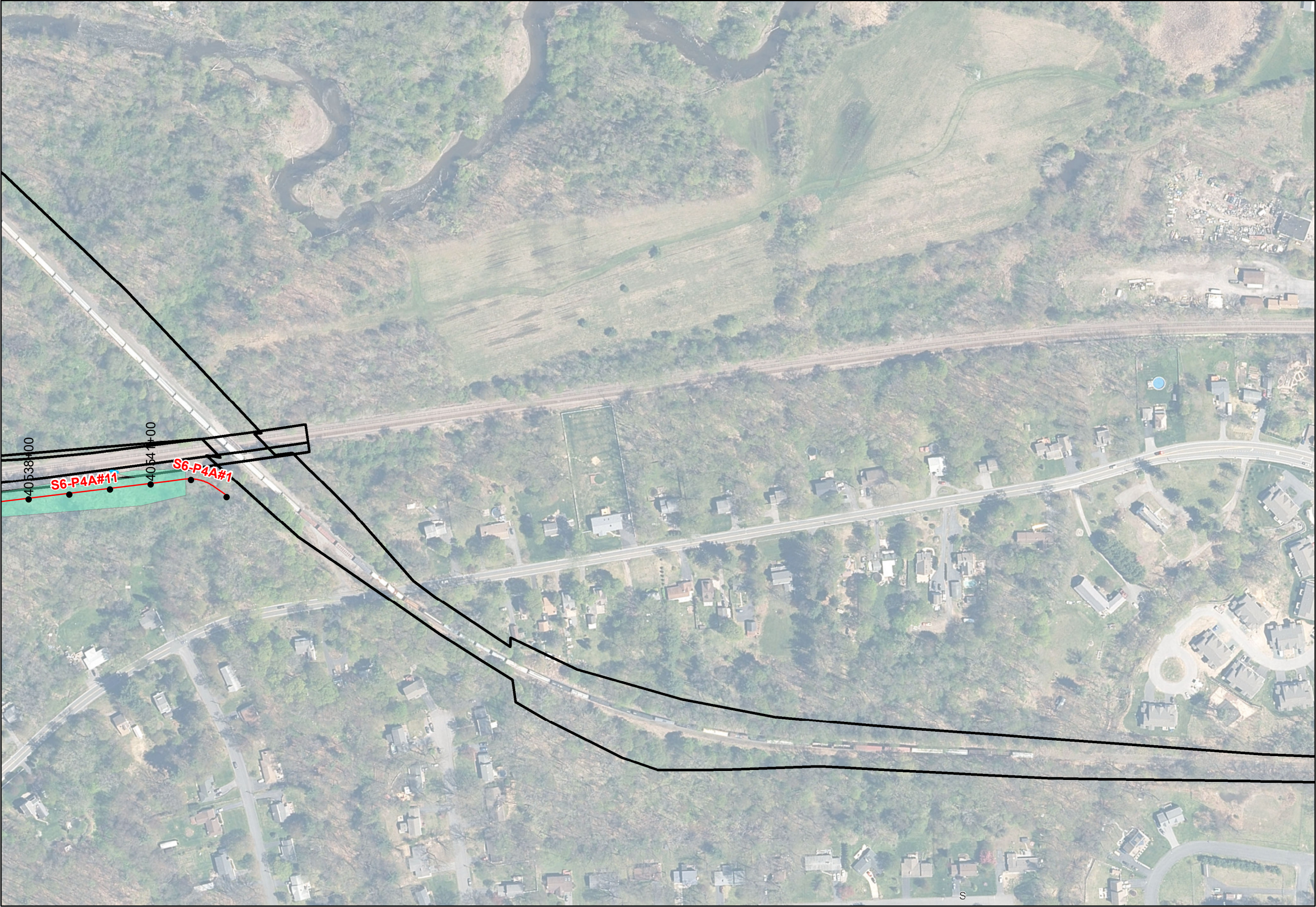
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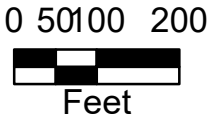
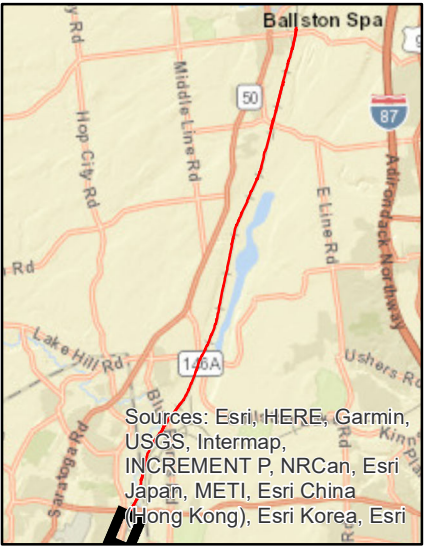
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CHPE EM&CP  
Saratoga and  
Schenectady County,  
New York  
Deviation Zone Analysis



- Stations
- Excursions
- Delineated Streams
- Delineated Wetlands
- ▭ Deviation Zone





#### **4.5.3.3 *Threatened and Endangered Species***

Excursion area S6-P4A#11 will not result in any changes to the Facility's impacts on federally listed or state-listed species or habitat.

#### **4.5.3.4 *Wetlands and Streams***

Excursion S6-P4A#11 will result in temporary impacts to Wetland C-CP-O as described in Table 9.2 of the EM&CP.

### **5.0 CONCLUSION**

The exceedance areas described above for Segment 6 – Package 4A do not significantly increase adverse environmental impacts. Impacts associated with this work have been minimized and mitigated and can be addressed by the Certificate Conditions and Best Management Practices already approved by the Commission for the Facility. The deviation requested are necessary for appropriate engineering and environmental reasons and does not conflict with the other Certificate Conditions.

On that basis, the Certificate Holders respectfully request that DPS Staff approve these deviations from the ADZ with the Segment 6 – Package 4A EM&CP without modification to the Certificate.

In the alternative, should DPS Staff determine that a Certificate amendment is required to effectuate any of these changes to the ADZ, Certificate Holders respectfully request that the PSC consider this submission in lieu of a separate petition for an amendment, given that this EM&CP submission materially adheres to the same general procedural and substantive requirements which would otherwise be required for such an amendment (such as the dissemination of legal notices to affected landowners, notice to the public and host communities, and a robust justification for the changes requested). The ADZ changes will not result in any material increase in environmental impacts from the Facility—and, in fact, are intended to decrease environmental impacts at certain locations—and do not substantially change the location of the Facility for the reasons described in this memorandum. While the Certificate Holders do not believe that the adjustments outline in this memorandum constitute an amendment to the Certificate, should an amendment be necessary, Certificate Holders submit that a hearing is not required or warranted in accordance with PSL Section 123(2).